

WEINBERG WHEELER
HUDGINS GUNN & DIAL



Ryan T. Gormley, Esq.
rgormley@wwhgd.com
Nevada Bar No. 13494
WEINBERG, WHEELER, HUDGINS,
GUNN & DIAL, LLC
6385 South Rainbow Blvd., Suite 400
Las Vegas, Nevada 89118
Telephone: (702) 938-3838

*Local Counsel for Plaintiff,
Ernest Bock L.L.C.*

John F. Palladino, Esq.
john@hankinsandman.com
Evan M. Labov, Esq.
evanl@hankinsandman.com
HANKIN SANDMAN PALLADINO
WEINTROB & BELL, P.C.
30 South New York Avenue
Atlantic City, NJ 08401
Telephone: (609) 344-5161

*Pro Hac Counsel for Plaintiff,
Ernest Bock L.L.C.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ERNEST BOCK, L.L.C.,

Plaintiff,

vs.

Case No.: 2:19-cv-01065-JAD-EJY

PAUL STEELMAN, individually; MARYANN
STEELMAN, individually; PAUL STEELMAN,
as trustee of the Steelman Asset Protection Trust;
MARYANN STEELMAN, as trustee of the
Steelman Asset Protection Trust; JIM MAIN, as
trustee of the Steelman Asset Protection Trust;
STEPHEN STEELMAN; SUZANNE
STEELMAN-TAYLOR; PAUL STEELMAN as
trustee of the Paul C. Steelman and Maryann T.
Steelman Revocable Living Trust; MARYANN
STEELMAN, as trustee of the Paul C. Steelman
and Maryann T. Steelman Revocable Living Trust;
PAUL STEELMAN, as the trustee of the Paul
Steelman Gaming Asset Protection Trust;
KEEPSAKE, INC.; SMMR, LLC; SMMR, LLC,
SERIES A-Z; SSSSS, LLC; SSSSS, LLC, SERIES
B; CHRISTIANA, LLC; CHRISTIANA, LLC,
SERIES A-Z; COMPETITION INTERACTIVE,
LLC; PAUL STEELMAN, LTD.; STEELMAN
PARTNERS, LLP; PAUL STEELMAN DESIGN
GROUP, INC.; SAPT HOLDINGS, LLC, SERIES
B; AARON SQUIRES; and MATTHEW
MAHANEY,

Defendants.

**JOINT STIPULATION AND ORDER TO
CONTINUE HEARING ON THE
SECOND MOTION TO DISMISS AARON
SQUIRES AND MATTHEW MAHANEY
UNDER FED. R. CIV. P. 12(b)(6)**

(Second Request)



Plaintiff Ernest Bock, L.L.C. (“Bock”), the Steelman Parties¹, the Corporate Defendants², and the Attorney Defendants³ by and through their respective undersigned counsel, hereby submit this Second Joint Stipulation in accordance with LR IA 6-1 and LR 26-3. This is the second stipulation to adjourn the oral argument on the Second Motion to Dismiss Aaron Squires and Matthew Mahaney under Fed. R. Civ. P. 12(b)(6)⁴ (hereinafter, “Second Motion to Dismiss”) from the scheduled date of January 29, 2024⁵ to a date convenient for the Court between February 20, 2024 and March 1, 2024. The Second Motion to Dismiss was filed on September 25, 2023⁶.

a. Reasons for the Adjournment

Counsel for Bock has logistical difficulties appearing for an in-person oral argument in Nevada on Monday, January 29, 2024. The Parties have agreed to a brief extension to accommodate Bock’s counsel and submit that good cause exists for the same. Counsel for Bock remains available for the currently scheduled date, but only by remote appearance. We understand the Court has directed in person and the Parties would prefer that, as well.

b. Previous Extensions

¹ The “Steelmen Parties” refer to Defendants Paul Steelman, individually; Maryann Steelman, individually; Paul Steelman, as trustee of the Steelman Asset Protection Trust (“SAPT”); Maryann Steelman, as trustee of the SAPT; Jim Main, as trustee of the SAPT; Stephen Steelman; Suzanne Steelman-Taylor; Paul Steelman, as trustee of the Paul C. Steelman and Maryann T. Steelman Revocable Living Trust (“RLT”); Maryann Steelman, as trustee of the RLT; and Paul Steelman, as trustee of the Paul Steelman Gaming Asset Protection Trust.

² The “Corporate Defendants” refer to Christiania, LLC; Christiania, LLC, Series A-Z; Competition Interactive, LLC; Keepsake, Inc.; Paul Steelman Design Group, Inc.; Paul Steelman, Ltd.; SAPT Holdings, LLC, Series B; SMMR, LLC; SMMR, LLC, Series A-Z; SSSSS, LLC; SSSSS, LLC, Series, B; and Steelman Partners, LLP. Bock named SMMR, LLC, Series A-Z and Christiania, LLC, Series A-Z as defendants and contends that they consist of fifty-two (52) separate defendants (i.e., SMMR, LLC, Series A; SMMR, LLC, Series B; etc.). Defendants disagree. In the interest of brevity, those defendants have been stylized as “Series A-Z.”

³ For purposes of this stipulation, the “Attorney Defendants” will refer to Aaron Squires; and Matthew Mahaney.

⁴ ECF No. 245.

⁵ ECF No. 254.

⁶ ECF No. 245. This Second Motion to Dismiss is re-filed by the Attorney Defendants. The first Motion to Dismiss Aaron Squires and Matthew Mahaney under Fed. R. Civ. P. 12(b)(6) (the “First Motion”) was filed on July 23, 2021. *See* ECF No. 171. The Court stayed the case, including its ruling on the First Motion, on March 2, 2022. *See* ECF No. 235.

There has been one previous extensions of the scheduled oral argument date on the Second Motion to Dismiss.

c. Stipulation

Bock, the Steelman Parties, the Corporate Defendants, and the Attorney Defendants, hereby stipulate and agree, contingent upon this Court's approval, that:

1. The oral argument on the Second Motion to Dismiss that is currently scheduled for January 29, 2024 at 3:00 p.m. in LV Courtroom 6D before Honorable Judge Jennifer A. Dorsey be continued and reset to one of the following dates: February 20, 2024; February 21, 2024; February 26, 2024; February 28, 2024; or a date and time convenient thereafter for the Court.

Dated: January 25, 2024.

DATED: January 25, 2024.

DATED: January 25, 2024.

**HANKIN, SANDMAN, PALLADINO,
WEINTROB & BELL, P.C.**

**BROWNSTEIN HYATT FARBER
SCHRECK, LLP**

BY: /s/ John F. Palladino
JOHN F. PALLADINO, ESQ. (*pro hac vice*)
john@hankinsandman.com
EVAN M. LABOV, ESQ. (*pro hac vice*)
evanl@hankinsandman.com
30 South New York Avenue
Atlantic City, NJ 08401
Pro-Hac Counsel for Plaintiff

BY: /s/ Frank M. Flansburg
FRANK M. FLANSBURG III, ESQ., #6974
fflansburg@bhfs.com
EMILY A. ELLIS, ESQ., #11956
eellis@bhfs.com
EMILY L. DYER, Esq.
edyer@bhfs.com
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614
Attorneys for the Steelman Parties

DATED: January 25, 2024

DATED: January 25, 2024

BALLARD SPAHR, LLP

**SOLOMON DWIGGINS FREER &
STEADMAN, LTD.**

BY: /s/ Joel E. Tasca
JOEL E. TASCA, ESQ.
tasca@ballardspahr.com
1980 Festival Plaza Drive, Suite 900
Las Vegas, NV 89135
Attorney for Corporate Defendants

BY: /s/ Jeffrey P. Luszeck
JEFFREY P. LUSZECK, ESQ.
jluszeck@sdfnlaw.com
ROBERTO M. CAMPOS, ESQ.
rcampos@sdfnlaw.com
9060 West Cheyenne Avenue
Las Vegas, NV 89129
Attorney for Attorney Defendants



ORDER

Based on the parties' stipulation [ECF No. 255], IT IS ORDERED that the oral argument on the Second Motion to Dismiss currently scheduled for January 29, 2024 is VACATED and CONTINUED TO February 26, 2024 at 2:30 pm.


UNITED STATES DISTRICT JUDGE
January 26, 2024

